

REMARKS

Reconsideration of this application is respectfully requested in light of the foregoing amendments and the following remarks.

Each of claims 2 and 31 has been amended for reasons unrelated to patentability, including at least one of: to explicitly present one or more elements implicit in the claim as originally written when viewed in light of the specification thereby not narrowing the scope of the claim, to detect infringement more easily, to enlarge the scope of infringement, to cover different kinds of infringement (direct, indirect, contributory, induced, and/or importation, etc.), to expedite the issuance of a claim of particular current licensing interest, to target the claim to a party currently interested in licensing certain embodiments, to enlarge the royalty base of the claim, to cover a particular product or person in the marketplace, and/or to target the claim to a particular industry.

Claims 42-44 have been added. Claims 2-8, 10-12, and 30-44 are now pending in this application. Claims 2, 31, and 42 are the independent claims.

I. The Obviousness Rejection

Claims 2-4, 6-8, 10-12, and 30-41 were rejected under 35 U.S.C. § 103(a) as being unpatentable over various combinations of Thomas (U.S. Patent No. 6,421,339) in view of Tiedemann (U.S. Patent No. 5,862,471). These rejections are respectfully traversed.

Claims 5 and 34 were rejected under 35 U.S.C. § 103(a) as being unpatentable over various combinations of Thomas (U.S. Patent No. 6,421,339) in view of Tiedemann (U.S. Patent No. 5,862,471) and/or Chau (U.S. Patent No. 5,764,750). These rejections are respectfully traversed.

None of the cited references, either alone or in any combination, establish a *prima facie* case of obviousness. "To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in

the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure." See MPEP § 2143.

Each of independent claims 1 and 31 recites "translating, by the home gatekeeper, the alias address to a called routable alias address for the called H.323 entity, the called routable alias address received from a **database external to a domain of the home gatekeeper and external to a domain of the H.323 entity**".

Thomas does not expressly or inherently teach or suggest "a database **external to a domain of the home gatekeeper and external to a domain of the H.323 entity**". Instead, Thomas only illustrates "visiting location registers (VLR)" and "home location registers (HLR)" **internal** to domains. See, for example, Fig. 1, in which domain 10 is connected to network domain 12 via packet data network 30, and VLR 64 and HLR 66 are shown within domain 10, and VLR 68 and HLR 70 are shown within network domain 12. Thomas allegedly recites the "[d]omain 12 includes a combination router and gateway block ... gatekeeper 14 has connected thereto a visiting location register (VLR) 64 and further has a home location register (HLR) 66 ... the VLR and HLR functions may readily be incorporated within a gatekeeper ... gatekeeper boxes 14 and 44 further include software for providing the added functions necessary to register visiting users, assign transient identities, forward incoming communications to the last known location of a roaming endpoint user". See col. 3 lines 11-44.

Thus, Thomas does not teach expressly or inherently "translating, by the home gatekeeper, the alias address to a called routable alias address for the called H.323 entity, the called routable alias address received from a **database external to a domain of the home**

gatekeeper and external to a domain of the H.323 entity". Neither Tiedemann nor Chau overcome the deficiencies of Thomas.

Thus, even if there were motivation or suggestion to combine Thomas with Tiedemann and/or Chau to arrive at the claimed subject matter (an assumption with which the applicant disagrees), and even if Thomas, Tiedemann, and/or Chau were combinable or modifiable (another assumption with which the applicant disagrees), the cited references do not expressly or inherently teach or suggest **every** limitation of the independent claims.

Accordingly, it is respectfully submitted that the rejections of claims 2, 31, and 42 are unsupported by Thomas in view of Tiedemann and/or Chau and should be withdrawn. Also, the rejections of claims 3-8, 10-12, 30 and 32-41, each ultimately depending from one of independent claims 2 or 31, are unsupported by Thomas in view of Tiedemann and/or Chau and also should be withdrawn.

CONCLUSION

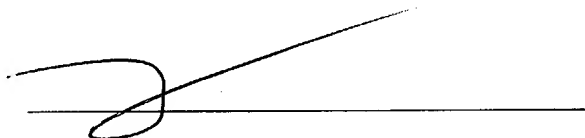
It is respectfully submitted that, in view of the foregoing amendments and remarks, the application as amended is in clear condition for allowance. Reconsideration, withdrawal of all grounds of rejection, and issuance of a Notice of Allowance are earnestly solicited.

The Office is hereby authorized to charge any additional fees or credit any overpayments under 37 C.F.R. §1.16 or §1.17 to Deposit Account No. 50-2504. The Examiner is invited to contact the undersigned at 434-972-9988 to discuss any matter regarding this application.

Respectfully submitted,

Michael Haynes PLC

Date: 30 June 2004

A handwritten signature in dark ink, appearing to be 'Michael N. Haynes', is written over a horizontal line.

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